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January 6, 2020

By ECF and First Class Mail

Hon. Kenneth M. Karas
United States District Judge
United States Courthouse
300 Quarropas Street, Chambers 533
White Plains, NY 10601-4150

Re: Case Concepts International, LLC et al. v. Teich, Beim & Moro, et al.
(Case No. 7:16-cv-07664-KMK)

Dear Judge Karas:

We are writing this joint letter to request a 30 day stay of all proceedings and discovery in order to allow plaintiff and defendant to mediate this dispute with retired Justice Allen Hurkin Torres at JAMS. The parties have already reserved January 15, 2020 as the first mediation session with Justice Torres.

The parties are currently embroiled in extensive and contentious litigation. Among other things, the parties are currently engaged in disputes over the production of documents and testimony that plaintiff asserts to be privileged and the interpretation of complicated tax issues which require the retention of experts. The Court has just scheduled a conference for January 29, 2020 in connection with the discovery disputes, which could result in additional motion practice. The parties' settlement positions have also narrowed to the point that counsel believe mediation is likely to result in the settlement of this matter.

For these reasons, counsel for plaintiff and defendant, with the consent of counsel for third-party defendant, respectfully request a short 30 day stay of all proceedings and discovery to focus on the mediation and the efficient resolution of this matter.

Thank you for your consideration.

Respectfully submitted,

/s/ David Feuren (DF-0774)
/s/ Martin Murray (MM-5103)

*Created,
So ordered*

[Handwritten signature]
1/7/20

cc: Daniel C. Green, Esq. (By ECF)